



Dacorum Borough Council | Three Rivers District Council | Watford Borough Council

Stage Two Review

OF THE

SOUTH WEST HERTFORDSHIRE

Strategic Housing Land

Availability Assessment



July 2010

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1. Introduction

- 1.1 This report responds to recent feedback Dacorum Borough and Watford Borough Councils have separately received (stage 1 reviews) on the Strategic Housing Land Availability Assessment (SHLAA)¹. The findings of the stage 1 reviews highlighted a range of issues, particularly the need to consult with the development sector about the assumptions and conclusions on potential housing sites. The report aims to address these issues as part of a stage 2 review of the SHLAA, and suggests how it might be taken forward through the three authorities' Local Development Frameworks and future updates to the SHLAA.
- 1.2 Consultants, Tribal Urban Studio, were commissioned by Dacorum Borough Council, Three Rivers District Council and Watford Borough Council to undertake a joint SHLAA. The document sought to estimate the available housing potential in each of the authority's areas. The SHLAA was completed in October 2008 (South West Hertfordshire Strategic Housing Land Availability Assessment – Final Report (October 2008)).
- 1.3 The Government wants each authority to be confident that it can identify and deliver a rolling programme of housing to meet the community's need for more homes. The SHLAA is one critical element of this as it identifies a source of future housing capacity that can underpin housing land supply assessments. It can also help to develop the housing programme of the three authorities in their respective emerging Core Strategies by identifying sources of sites.
- 1.4 In the summer/autumn of 2009 both Dacorum and Watford Borough Councils asked their respective Local Development Framework Critical Friends to review the "soundness" of their emerging Core Strategies and the supporting evidence base (including the SHLAA). This represented a "stage 1" review of the SHLAA.
- 1.5 In both authorities, the Critical Friends commented on the SHLAA and made suggestions as to how each could take forward the findings into their Core Strategy and Site Allocations Development Plan Documents (DPDs) through a "stage 2" review. Watford's Critical Friend did raise a number of detailed issues with the SHLAA including the management of the SHLAA, partnership involvement, range of sites considered and their deliverability / developability, and the need for a regular review and liaison with stakeholders. We have

¹ The stage 1 reviews provided an initial overview of the robustness of the SHLAA. This stage 2 review takes forward recommendations of the stage 1 reviews and involves stakeholders in further assessment of the soundness of the SHLAA. Each authority will aim to take forward the recommendations made through the two phases of SHLAA reviews into future roll forwards of the SHLAA and in progressing housing land supply through their respective Local Development Framework.

attempted to address many of these concerns in this report in considering how best to take forward the baseline work of the SHLAA.

- 1.6 Dacorum has already begun its own work on moving forward the original SHLAA data and feeding this into their Annual Monitoring Report. Such work was undertaken through their Housing Land Availability Paper (April 2009) produced in support of the housing programme to their emerging Core Strategy (June 2009). This current process is seen as complementing and refining the work in the SHLAA report. The sites have also been subject to consultation through the Site Allocations DPD Supplementary Issues and Options paper (November 2008).
- 1.7 Three Rivers has updated its SHLAA data through Annual Monitoring Reports and housing trajectories which have refined the SHLAA data and incorporated the latest available information on sites. Three Rivers has also used the original SHLAA data to inform consultation on housing sites as part of the Core Strategy Preferred Options (February 2009) and Further Preferred Options (November 2009).
- 1.8 Watford will be updating and refining information on the SHLAA as part of the site allocations process. The Site Allocations DPD issues and option stage is timetabled for mid 2011. The SHLAA sites will then be looked at in the context of other studies that have been commissioned for Watford.

2. STAKEHOLDER INVOLVEMENT

- 2.1 One of the key requirements for taking the SHLAA forward highlighted by the stage 1 review was to involve key stakeholders in the process. Government guidance² advises that stakeholders can contribute important knowledge and expertise, particularly about the housing market, the deliverability and developability of sites and how market conditions may affect economic viability. Stakeholders should also help to shape and test the methodology and assumptions underpinning the SHLAA.
- 2.2 Over 40 organisations, both in the public and private sector, which have an interest in development within the authorities' area, were contacted by letter with a view to setting up a SHLAA Panel (Appendix 1). The three authorities were keen to get a wide range of organisations involved, including developers, land agents, housing associations, infrastructure providers and planning consultants (Appendix 2).
- 2.3 An initial meeting was arranged for 25th January 2010 (Appendices 3 and 4) at Dacorum Borough Council to inform stakeholders about the SHLAA review process, and to establish members for the SHLAA panel. 16 people attended.
- 2.4 At the meeting a presentation was given about the SHLAA outlining the key issues to be discussed (Appendix 5). This presentation then prompted discussion within the group on what would be the best way to draw out and debate the issues in more detail. It was agreed that a further meeting was necessary, and if essential a third meeting was scheduled.
- 2.5 A SHLAA panel was established from the attendees consisting of 8 volunteers (excluding Council representatives) (Appendix 6). The panel members were invited to the subsequent meeting, and attendees who were not on the SHLAA Panel were invited to submit any further comments in writing on the issues raised. The notes of the initial meeting can be found at Appendix 6.
- 2.6 Further representations regarding the application of the SHLAA's greenfield selection criteria were received from CGMS after the meeting (Appendix 7).
- 2.7 The second meeting on 18th February 2010 (Appendix 8), sought to discuss the different types of sites that provide potential sources of housing (see meeting prompts at Appendix 9 and 10). Examples from each potential housing source were used as a starting point to find out the views of the panel on how the SHLAA had tackled these sites, including any assumptions made by the SHLAA. In addition, the Greenfield criteria assessment used to assess

² CLG (2007) Strategic Housing Land Availability Assessment Practice Guidance
<http://www.communities.gov.uk/publications/planningandbuilding/landavailabilityassessment>

the suitability of greenfield sites was discussed. The meeting notes can be found in Appendix 11.

- 2.8 The panel members raised no issues regarding the need for additional stakeholder input or any requirement to discuss further individual sites. It was agreed that no other meetings would be necessary and it would be sufficient to circulate the final minutes and notes to all stakeholders involved requesting any further comments or contributions.
- 2.9 In addition to the formal stakeholder involvement in the SHLAA review process, much information has been obtained from stakeholders on specific housing sites through public consultation undertaken by each authority on Local Development Framework documents. This stakeholder input is available to each authority to use in updates of the SHLAA and in developing housing trajectories.

3. BROAD ISSUES

3.1 The first SHLAA review meeting provided an opportunity to discuss with the development sector the methodology and assumptions of the Strategic Housing Land Availability Assessment (SHLAA) (Appendices 3 to 6). The authorities were seeking endorsement of as many of the underlying principles as possible, or to at least identify whether additional work was needed to reinforce the approach taken.

a) Impact of the recession and post-recovery

3.2 The authorities were keen to understand what effect the development sector felt the current economic downturn might have on the delivery of sites. Furthermore, both Critical Friends highlighted the importance of taking stock of recent changes in the housing market. While there was interesting debate on the subject, no detailed suggestions were made by any attendee as to how (or whether) the delivery and phasing of sites should be modified. However, some broad points were made that are of interest.

3.3 Housing supply is seen as being affected by the recession for the next couple of years (possibly up to 5 years according to one attendee). Some recovery was highlighted in Berkhamsted and Watford, but the Hemel Hempstead market was still thought to be weak. While outside the control of planning, the availability of mortgages (for both market and shared ownership properties), the ability of first-time buyers to afford deposits, and the reluctance of banks to fund developments are seen as impacting on the demand for housing.

3.4 Many attendees highlighted a perceived oversupply of flats and, as a consequence, the lack of attractiveness of this type of accommodation to banks and developers. They felt that such accommodation, particularly in town centre locations, was likely to come forward in the short-term at a much slower pace than in the recent past. As a result of high levels of flatted town centre schemes, Hemel Hempstead was seen as being particularly affected compared to Three Rivers and Watford.

3.5 Some developers and agents argued that the authorities should accept a greater role for greenfield sites in the early phase of housing supply. Such sites were considered to be more deliverable in the short term, would help meet housing targets and achieve a better balance of house types away from flats towards larger family homes. Providing larger family homes was seen as releasing smaller properties lower down the housing chain and acting as a catalyst for first time buyers.

3.6 One agent considered that greater flexibility over the content and timing of financial contributions might help developers deliver housing given present market conditions, but this is more an issue for the Development Management process than the SHLAA. It was pointed out that Housing Associations have

been trying to be more active to compensate for the lack of market housing activity, although this is not viewed as a long-term solution.

- 3.7 The above points suggest that the authorities ought to take a more cautious approach to the delivery of sites that involve flatted development in years 0-5 in the SHLAA. This is something that should be assessed in updates to the baseline SHLAA. However, it is expected that sites will recover in years 6-10 where there is greater long term optimism, and their contribution should not be ruled out. Greenfield sites could play a stronger role in the early phases of the housing supply, but decisions on the timing of these sites are best tackled through the Local Development Framework process.

b) Windfalls

- 3.8 Attendees considered that windfalls should not form a large part of future land supply in the SHLAA. Windfalls were seen as a diminishing resource over time. While the SHLAA does not include any assumptions about windfalls, the authorities will need to carefully justify the role and levels of windfalls in their future housing programmes.

c) Density / design case studies

- 3.9 There was little discussion on this subject. An agent suggested that higher density (presumably flatted) schemes should be pushed back in terms of their phasing. This point can be tackled in SHLAA updates when dealing with a) above.

d) Greenfield assessment

- 3.10 Most of the debate on this matter was about the merits of such sites, their deliverability and the need to bring them into earlier stages of phasing rather than the actual assessment criteria.
- 3.11 However, CGMS did raise concerns outside the meeting (see Appendix 7) about what was considered to be a lack of transparency in the SHLAA over how sites (in Bovingdon) were rejected against the criteria. This is accepted as a valid criticism that needs to be addressed and Appendix 12 seeks to provide additional information on why sites did not meet the greenfield criteria in the original SHLAA.
- 3.12 CGMS were also concerned over the relationship between the greenfield assessment process in the SHLAA and how sites would ultimately be selected through the Local Development Framework. It is not the role of this report to consider detailed allocation issues on specific sites. The SHLAA is simply one source of information of many for assessing the suitability of sites. Any site would need to be assessed in greater detail against the evidence base,

including a Sustainability Appraisal, as part of preparation of the LDF documents.

e) Deliverability / developability

- 3.13 Attendees appeared to broadly support the assumption that there would be a healthy delivery of sites throughout the 20 year time-frame of the SHLAA. There appears to be an acceptance of the difficulties the SHLAA faces in predicting housing supply over long periods of time.
- 3.14 The Development Management system was seen as a barrier to the delivery of schemes. One route suggested to improve this situation was a "fast-track" application service. This is outside the scope of the report to address.

f) Other issues

- 3.15 No further comments were made.

g) Stakeholder Involvement

- 3.16 No concerns were raised over the proposed arrangements for stakeholders to get involved in the review of the SHLAA.

4. GROUPS OF SITES

- 4.1 This chapter sets out the comments and conclusions of the SHLAA Panel (see Chapter 2) reached in the second meeting. The meeting tackled the assumptions made by the SHLAA on groupings of sites. It also highlights areas for future work as part of updates to the baseline SHLAA.
- 4.2 Groups of sites to be considered by the panel were identified with reference to Figure 4 of the Strategic Housing Land Availability Assessment Practice Guidance³ which suggests sources of sites with potential for housing. These were then adjusted to better reflect the precise types of sites considered by the SHLAA. The groups of sites considered were:
- Commitments
 - Housing in Residential Areas
 - Employment Land
 - Town and Local Centres
 - Community Uses
 - Urban Open Spaces
 - Rural Sites
 - Greenfield
 - Other Opportunities.
- 4.3 Example sites from each category were also provided as a prompt to the Panel and led to specific suggestions on some sites. These suggestions are detailed as part of the notes to the Panel meeting (Appendix 11), and where relevant will be incorporated into each authority's update to the SHLAA.

a) Commitments

- 4.4 The Panel considered that it is reasonable for the SHLAA to include committed sites, either as a result of planning permission or existing Local Plan Allocations, unless there are strong reasons not to do so. It was also considered reasonable to include planning permissions that have lapsed unless there is evidence to suggest that they will not come forward. As the SHLAA covers a 20 year period it was suggested by the Panel that you can reasonably assume that where profits can be made from developing land, sites will ultimately be brought forward.
- 4.5 The authorities will therefore continue to include committed sites in any updates to the SHLAA, unless there are valid reasons against their inclusion, for example as a result of covenants on the land preventing development.

³ Communities and Local Government "Strategic Housing Land Availability Assessment Practice Guidance – July 2007"

b) Housing in residential areas

- 4.6 The Panel did not consider that there was any potential for large scale residential redevelopment (as a potential source suggested in the Practice Guidance) within the study area, a view shared by the authorities.
- 4.7 When assessing sites in multiple ownership, the Panel considered that the greater the numbers of owners the greater the problems associated with bringing them forward. Therefore, the timeframe for development increases. Particularly as a result of the recession, there is little money available at present to fund land assembly. Such sites may be included in the SHLAA, but should be phased later unless there is information that land assembly has already taken place. Rolling reviews of the SHLAA will allow updates to the phasing of these sites as new information becomes available.
- 4.8 The Panel believed that including many sites in multiple ownership or where owners' intentions are not clear may lead to problems demonstrating a land supply if there is an over reliance on these sources. This should not be a problem if there are only a few sites and they have not been included in the five year supply.
- 4.9 The Panel agreed that the SHLAA should only include garage blocks or parking areas where there is information that they will come forward given the need for parking is now growing. It was noted that the supply of garage blocks is likely to reduce in future as less constrained sites have already been developed.
- 4.10 There may be ample opportunities in Watford and Three Rivers to convert three or four interwar houses into blocks of flats. However, redevelopment of gardens or existing dwellings is viewed as a reducing supply and thus there is less potential for gains.
- 4.11 The above suggests that it is appropriate for the SHLAA to include sites in residential areas where there is information to suggest that they will come forward. This may include sites in multiple ownership. The latter will need to be phased in later periods to reflect the difficulties associated with bringing these sites forward.

c) Employment land

- 4.12 The Panel accepted that housing growth needs to be balanced with employment and that ideally the SHLAA should be integrated with employment land studies. It was recognised that the SHLAA is not the only source of information for the allocation of sites.

- 4.13 The Panel believe that the recession has had an impact on the office market, and this is expected to be one of the last sectors to recover. However, within the longer term timeframes of the Local Development Framework this may not be an issue.
- 4.14 When considering whether employment sites should be included for housing, it was suggested that its location, the quality of buildings and the suitability of the site for the commercial use need to be assessed. If they prove acceptable then it should remain as employment, but if a site is fundamentally redundant and unsuitable it could be converted to residential.
- 4.15 While it may be desirable to have a mix of uses on a site, for example to convert part of an employment site, it may be difficult to sell the housing, particularly if access to the residential part is through an employment area. This may prevent parts of employment sites coming forward in isolation for residential use, but does not mean that schemes could not include for example flats with offices or retail at ground floor level.
- 4.16 In the past, residential values may have exceeded alternative employment uses. In the future, affordable housing and the introduction of the Community Infrastructure Levy requirements may mean that housing becomes less viable, and that employment sites are no longer seen as being attractive for redevelopment to residential. The value of the employment site will also be an issue, for example while Watford is strong in providing offices which are relatively high value, Hemel Hempstead has more warehousing which is lower value and may therefore be more attractive for conversion to residential.
- 4.17 Therefore, while SHLAA updates may include employment land, the authorities should be cautious about including parts of employment sites, or assuming that it will always be viable to develop housing in place of employment uses.

d) Town and local centres

- 4.18 There was limited discussion on this group of sites. The Panel felt that there was still a market for residential properties above shops and commercial units. While their lower resale values mean there is more demand currently, there may also be problems in securing mortgages for these.
- 4.19 It is concluded that it is appropriate to include town and local centre sites in future SHLAA updates.

e) Community uses

- 4.19 The Panel thought that while former educational land has been an important source of housing in the past, the County Council are now looking for new school sites so it may not be possible to rely on this supply in the future.

However, sites should be included where there is a reasonable indication that they will come forward. The Panel was split as to how much of the site should actually be made available for development and felt that the site's contribution to open space / green infrastructure in the area needed to be assessed.

- 4.20 The Panel considered that it is acceptable to include other sites in community use where there is clear intent to develop. They should only be phased earlier where there are known details, for example on whether the site will be released and how much of the site. Otherwise they should be considered from years 10-15 onwards. One member of the Panel suggested some form of marketing would be appropriate to test the need for the community use.
- 4.21 The authorities feel that there is support to include sites in community use in the SHLAA updates where there is an indication that they are likely to come forward for redevelopment. They should only be phased in the 0-5 or 6-10 year periods where there are known details of expected redevelopment.

f) Urban open spaces

- 4.22 It was concluded that where sites are surrounded by residential, then they must be considered as suitable for this type of development. The Panel debated whether all of the land should be made available for housing and its impact on capacities. One suggestion made was to obtain as much information for relevant sites from landowners / developers to help with an assessment of capacities and timing. However, results of open space studies must be fed into the allocations process so that where there is a deficiency in open space, sites are not allocated or dwelling capacities are reduced.
- 4.23 Given the above, it is believed that urban open spaces can be included in SHLAA updates subject to careful consideration of capacities and impact on the quality, role and quantity of open space.

g) Rural sites

- 4.24 The Panel had concerns about whether the SHLAA should include sites in Green Belt villages that could comprise future rural exceptions sites. It was suggested that the SHLAA could identify a potential for up to 20 units, but not actual sites. The exception may be where sites are non-conforming in their location, for example garages.
- 4.25 Sites on the edge of village centres which are excluded from the Green Belt should be included in the SHLAA.
- 4.26 It is felt that rural sites on the edge of village centres excluded from the Green Belt, and rural sites which are non-conforming with their surroundings can be included in SHLAA updates. However, the SHLAA is meant to be policy neutral and Green Belt sites should be included where of an appropriate scale

and location, with decisions on whether to take them forward (as a rural exception) to be made through the Site Allocations DPD.

h) Greenfield

- 4.27 The Panel considered that where a greenfield site has not been accepted, the SHLAA should identify the criterion by which it has been rejected. This issue has been picked up earlier in paragraphs 3.10 - 3.12 and Appendix 12.
- 4.28 There was support for Dacorum's approach⁴ to separating out greenfield sites from urban capacity. This was seen as reasonable and would provide a pool of greenfield sites to consider through the allocations process.
- 4.29 The Panel agreed with the approach of the SHLAA to using lower dwelling densities on larger greenfield sites to reflect the need to provide infrastructure. However, where developers have provided information on site capacity that is based on discussions with infrastructure providers and their requirements, this more evidence-based capacity may be used.
- 4.30 When phasing greenfield sites, the Panel advised that large sites have long lead-in times which needs to be factored in. The first building may take 3 years beginning with 20-30 units per year, followed by rates of up to 50-60 units per year. On larger sites this could rise to up to 120 units per year where plots have been sold off, although this will depend on the capacity of the market to absorb these units.
- 4.31 Therefore, in future SHLAA updates the lower densities will be applied to determine capacities unless there is better and more up to date evidence-based information suggesting an alternative figure. Phasing of sites will need to take into account the expected longer lead in times and progressively increasing delivery rates on greenfield sites.

j) Other opportunities

- 4.32 The Panel did not consider that there were any other groups of sites not already identified that should be discussed.

⁴) Dacorum Borough Council "Housing Land Availability Paper – April 2009"

5. CONCLUSIONS AND ACTION POINTS

- 5.1 A number of findings have emerged out of the stage 1 review process and as part of the stage 2 review through the meetings with stakeholders and the SHLAA Panel. The three councils have drawn a number of conclusions about the original SHLAA and identified potential improvements they can act upon. These need to be taken into account through future updates to the SHLAA and when taking the SHLAA forward through the Local Development Framework process.
- 5.2 The main conclusions of the SHLAA review process and where relevant action points for future updates and Site Allocations work are summarised below (Table 1). Dacorum and Three Rivers have already taken steps to roll forward and monitor SHLAA sites, and therefore not all the actions set out will be relevant or apply with equal force to each authority.

Table 1 Conclusions and actions on the SHLAA

Conclusion:	Action:
1. The SHLAA should be updated to take account of the latest available information including the effects of the recession, as well as incorporating SHLAA review recommendations.	Each authority will complete an update of the SHLAA that will reconsider all original SHLAA sites (wherever possible for both rejected and accepted sites) against the findings of the SHLAA review. This will also need to take account of earlier appraisal work in the case of Dacorum. The update will incorporate, where possible, new information that has become available about sites and the impact of the recession. Updates may include new sites that were not considered by the original SHLAA.
2. The SHLAA should be subject to consultation with stakeholders.	As part of the SHLAA updates to be carried out, all sites will be assessed against the methodology agreed by stakeholders following their involvement in the SHLAA review process. Where practical, there will be continued stakeholder contribution to SHLAA updates.
3. The SHLAA needs to be kept under regular review to take account of up to date information.	The SHLAA will be regularly monitored and updated through the Annual Monitoring Report process. This will include revisions to the housing trajectory. Updates may

	revisit excluded and rejected sites where new information on a site suggests that it may be deliverable. SHLAA updates will include information on the deliverability and developability of each site reflecting the most up to date information available.
4. The SHLAA is focused on sites that have been put forward by landowners and developers, rather than looking at all possible sites and considering them on good planning grounds. This is particularly the case for greenfield sites.	Future SHLAA updates may consider sites not suggested by landowners/ developers, though it is recognised that this may generate a significant amount of work, and without information from landowners, conclusions over the deliverability of sites will be less certain.
5. As much information as possible should be gathered about each site to increase confidence in conclusions drawn about the deliverability / developability of housing.	The SHLAA updates will include discussions on specific sites with other relevant local and county council departments, including those who have responsibility for development management, highways, biodiversity and open space etc. Authorities will consider contacting site owners with draft SHLAA information on their site and asking them to confirm/ amend the information. Information gained through consultation on Local Development Framework documents will also contribute to the assessment of sites.
6. Collecting more information on the deliverability of sites may allow constraints to delivery to be identified and suggest possible solutions to overcome them.	SHLAA updates will include where possible information on barriers to delivery of sites, and potential solutions to overcome these constraints where appropriate.
7. The SHLAA is not the only piece of evidence for deciding the allocation of sites. Decisions also need to have regard to other evidence base studies such as employment and Green Infrastructure studies, Sustainability Appraisals, and to the results of public consultation.	To judge the suitability of sites as allocations they will need to be assessed against the SHLAA and all relevant sources of information.
8. Committed sites should be included in the SHLAA unless there are strong	SHLAA updates will continue to include committed sites unless

reasons not to.	evidence suggests otherwise.
9. The SHLAA should include sites in residential areas where there is information to suggest that they will come forward. Sites in multiple ownership may be included, but will generally be phased later to reflect the difficulties associated with bringing these sites forward.	SHLAA updates will include sites in residential areas where there is information to suggest that they can be delivered. Their phasing will reflect ownership constraints.
10. The SHLAA may include employment land. There should be caution about including parts of employment sites for redevelopment, or assuming that it will always be viable to develop housing in place of employment uses.	SHLAA updates will include employment sites (subject to the findings of employment land studies), but will not assume that housing will always be viable in place of employment uses. It will only include those parts of employment sites where there is specific information that the site is likely to come forward for redevelopment.
11. Town and local centre sites should be included in the SHLAA.	SHLAA updates will include town and local centre sites.
12. Sites in community use should be included in the SHLAA where there is indication that they are likely to come forward for redevelopment. They will only be phased in the 0-5 or 6-10 year periods where there are known details of any expected redevelopment.	SHLAA updates will include sites in community use where there is indication that they are likely to come forward for redevelopment. Sites will only be phased in 0-5 or 6-10 year periods where there are known details of expected redevelopment.
12. Urban open spaces may be included in the SHLAA, but there should be caution about carrying these sites through to allocation if they contribute towards open space and Green Infrastructure requirements.	SHLAA updates will include urban open spaces where appropriate.
13. Small-scale rural sites on the edge of village centres excluded from the Green Belt, and rural sites that are non-conforming with their surroundings, should be included in the SHLAA.	SHLAA updates to include rural sites on the edge of villages excluded from the Green Belt and non-conforming rural sites.
14. The SHLAA should identify reasons for rejecting greenfield sites. Lower densities will be applied to determine capacities of greenfield sites unless there is better evidence-	SHLAA updates to include reasons for rejection of greenfield sites (see also Appendix 12). Capacities of greenfield sites in SHLAA updates will continue to be based on lower

based information suggesting an alternative capacity. Phasing of sites will take into account expected delivery rates on greenfield sites.	densities unless evidenced-based information suggests otherwise. Greenfield site phasing in SHLAA updates will take into account expected delivery rates.
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APPENDICES

Appendix 1 Stakeholder invitation letter

Date: 11 January 2010
Your Ref.
Our Ref: 7.9.7/FW
Contact: Mr F Whittaker
E-mail: francis.whittaker@dacorum.gov.
uk
Directline: 01442 228383
Fax: 01442 228771



Dear Sir/Madam ,

SOUTH WEST HERTFORDSHIRE STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT – STAGE 2 REVIEW

I am writing to you to on behalf of Dacorum Borough Council, Three Rivers District Council and Watford Borough Council to invite you to a meeting on 25 January 2010 regarding the above review (agenda attached).

Every local authority is required to complete a Strategic Housing Land Availability Assessment (SHLAA) to:

- Identify sites with potential for housing
- Assess their housing capacity
- Assess whether and when they are likely to be developed.

The SHLAA aims to ensure that there is sufficient land available to meet the housing needs of our communities, both now and for the future. A joint South West Hertfordshire SHLAA was completed in October 2008 on behalf of the three authorities. It identifies potential housing sites and their development capacity over a 5, 10, 15 and 20 year time frame.

The SHLAA forms a key part of the evidence base underpinning each authority's Local Development Framework (LDF) (the new planning policy framework that will replace the existing Local Plans). It provides an assessment of available housing land to inform the allocation of sites to meet their future housing targets. The SHLAA will also help ensure that the most suitable and deliverable sites are identified.

The Government's practice guidance on SHLAAs encourages local planning authorities to work with key representatives from the house building industries such as local house builders, housing associations, and local property agents to ensure the integrity of the SHLAA.

We are therefore asking you at the meeting whether you would like to become a panel member to undertake an assessment of the SHLAA. Your views are important to us. In particular, we are seeking your expertise and understanding to help us take a view on the deliverability and timing of sites, to update our knowledge of individual sites, and to assess how current market conditions might affect how they come forward.

We intend to carry out the assessment between January and March 2010, and I would anticipate a maximum of three meetings during this time to be held at Dacorum Borough Council offices. The overall aim is not to re-open discussions on the original methodology, but to achieve a consensus with you on the treatment of broad groupings of sites, and to discuss specific sites where they raise issues. This will also be an opportunity to update and review progress on individual SHLAA sites based on information received through this process and through other sources.

We are not intending to comprehensively review the contents of the SHLAA at this stage. Furthermore, while we understand that some representatives may have specific land interests this is not the appropriate process to promote these as future allocations. Opportunities will arise for this through the LDF process of each authority.

If you would like to come to the meeting, then please could you confirm your attendance with me. In the meantime, if you would like to view the SHLAA it can be inspected using the following link:

<http://www.dacorum.gov.uk/default.aspx?page=1884#SHLAA>

We do hope you will get involved in ensuring the robustness of the SHLAA. I would appreciate it if you could let us know of your interest as soon as possible, as we intend to arrange the first meeting for late January 2010. Even if you do not want to directly get involved in this process, then we would still welcome any comments you may have on the document.

Please do not hesitate to contact me should you have any queries regarding the above or if you would like to discuss anything further.

Yours faithfully

Francis Whittaker
Senior Planning Officer
Spatial Planning
Enc.

Appendix 2 List of stakeholders invited to SHLAA meeting

Title	First Name	Second Name	Company
Mr	Jonathan	Harbottle	Land & Partners Limited
Mr	Matthew	Wood	Hertfordshire Property
Mr	George	Edkins	Hightown Praetorian & Churches H. A.
Mr	Keith	Edwards	Aldwyck Housing Association Ltd.
Ms	Mary	Hannington	The Guinness Partnership
Ms	Alison	Laing	Paradigm Housing
	Sir/Madam		Aitchinson Rafferty
Mr	Simon	Milliken	Freeth Meluish
	Sir/Madam		Braisier Freeth
	Sir/Madam		Faulkners
Mr		Waterhouse	Chipperfield Land Co.
	Sir/Madam		Beechwood Homes Ltd
Mrs	Helena	Deaville	Entec UK Ltd
	Sir/Madam		Home Builders Federation
Mr	Joel	Levy	Bellway Homes Ltd (North London)
Mr	Scott	Bailey	Galliard Homes Limited
	Sir/Madam		Laing Homes North Thames
Mr	Nigel	Agg	Taylor Wimpey
Mr	Iain	Taylor	Village Homes (Southern) LLP
	Kebbell Homes	c/o Wakelin Associates	The Old School House
		Network Housing Group	c/o Miss Flora MacLeod
	Fairview New Homes	c/o Mr Andrew Ransome	RPS
	Kebbell Country Homes	c/o Mr Andrew MacDougall	Consensus Planning
Ms	Tina	Barnard	Watford Community Housing Trust
Mr	Matthew	Calladine	Redrow Regeneration
Mr	Richard	Celland	Paradigm Housing Association
Mr	Graham	Cunningham	Laing Homes
	P	Eastwood	Ridgehill Housing Association
Mr	Dan	Henderson	George Wimpey North London
Mr	Enguang	Lee	Fairview New Homes
	Fairview New Homes	c/o Amit Malhotra	RPS Planning
Ms	Lynn	Mclver	George Wimpey North Thames
Mr	Les	Penn	Persimmon Homes
Mr	Gareth	Jones	Origin Housing Group
Mr	Matt	Richardson	Gleeson Homes Ltd
Dr		Oosthuizen	HTA Planning
		MEPC	c/o Mr Nick Guildford
	Sir/Madam	Head of Planning	Bidwells

Dacorum Borough Council, Three Rivers District Council, and Watford Borough Council's stage 2 review of the South West Hertfordshire Strategic Housing Land Availability (July 2010)

Mr	Andrew	Lockwood	Area Land Director
Ms	Kim	Webster	Crest Nicholson
Mr	Michael	George	Barratt
Mr	Dennis	Parker	

Appendix 3

SOUTH WEST HERTFORDSHIRE STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT – STAGE 2 REVIEW

Initial Meeting 25th January 2010

10am Bulbourne Room, Civic Centre, Hemel Hempstead

AGENDA

1. Welcome
2. Presentation – SHLAA background and aims of the review
3. Questions and answers session
4. Establishing arrangements for the panel members
5. Next stage
6. AOB

Appendix 4

SOUTH WEST HERTFORDSHIRE STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT – STAGE 2 REVIEW

Initial Meeting 25th January 2010

10am Bulbourne Room, Civic Centre, Hemel Hempstead

REVISED AGENDA

Part 1

1. Welcome
2. Presentation – SHLAA background and aims of the review
3. Questions and answers session
4. Establishing arrangements for the panel members
5. Next stage
6. AOB

Part 2

Discussion around main issues in the SHLAA.

Appendix 5

SUGGESTED ISSUES TO BE DISCUSSED

1. The recession / recovery

How long do you think the recession will last and what will be the pace of recovery?
Are some sources of sites/locations affected more than others? What types of sites might recover the quickest?

What is your view of the market at the moment?

How do we factor the impact of the recession into the SHLAA?

What can local authorities do to help with the recovery?

What have other authorities done with their SHLAAs in terms of the effects of the recession?

2. Windfalls

What role should windfalls play in the SHLAA?

Should the SHLAA include small sites (say less than 5 dwellings) or should they be treated as part of the windfall supply?

3. Density/design case studies

Are there any specific issues around densities/case studies used to assess housing capacities and how they were applied?

4. Greenfield assessment

Do you consider that the approach the SHLAA took to the assessment of greenfield sites was reasonable?

5. Deliverability/developability

We have assumed a healthy delivery of sites throughout the SHLAA. Is this a reasonable approach?

Is the SHLAA sufficiently clear as to the deliverability / developability of each identified site?

Does the study adequately deal with how constraints could be overcome and when?

When should rejected sites be revisited?

In Dacorum, we have revisited unphased sites and looked at including some sites in years 15-20. Is this a reasonable approach?

6. Others

Did the SHLAA miss anything fundamental out?

Are there any other significant sources of supply that we should cover?

How would you see the SHLAA being related to other technical work e.g. the SHMA, DES, Gypsy and Travellers study (Scott Wilson) and employment land supply?

7. Stakeholder involvement

Are you happy with the stakeholder arrangements proposed?

Appendix 6

Notes of South West Hertfordshire SHLAA Stage 2 Review Stakeholder Meeting

Initial Meeting 25 January 2010 at Dacorum Borough Council

In Attendance:

Francis Whittaker (FW)	Dacorum Borough Council
Catriona Ramsay (CR)	Watford Borough Council
Joanna Bowyer (JB)	Three Rivers District Council
John Kettlewell (JK)	Land at Shendish
Ralph Thornbury (RTh)	Land at Shendish
Dennis Parker (DP)	Land at Shendish
Neil Aitchison (NA)	Aitchison Rafferty
Luke Lambert (LL)	Beechwood Homes Ltd
Richard Tilley (RTi)	CGMS
Matthew Wood (MW)	Hertfordshire County Council
Sue Swain (SS)	Hertfordshire County Council
Andrea Gilmour (AG)	Hertfordshire County Council
Helena Deaville (HD)	Entec
George Edkins (GE)	Hightown Praetorian and Churches HA
Derek Bromley (DB)	Bidwells
Jane Wakelin (JW)	Wakelin Associates
Elliot Jones (EJ)	Rapleys
Graeme Free (GF)	DLA Town Planning Ltd
Robert Waterhouse (RW)	Chipperfield Land Company

Part 1

FW gave a presentation setting out the background to the SHLAA, the reasons for undertaking a review, progress on Local Development Frameworks, establishing the Review Panel and the aims and timetable for future progress on the SHLAA Review. Questions were then taken from the attendees.

JW	Many of the sites in the SHLAA at the moment are there because of vested interests; do you include sites that are not being promoted? It would seem more sensible to identify the most appropriate sites and then approach landowners to determine if they could be brought forward for development.
FW	Most sites will be identified because if they are being promoted, there is information that they will be developable/ deliverable.
JK	From experience, not everybody does want to sell their land
NA	Second that it is not always easy to get people to come forward. Have always found that certainly in Dacorum the Council has been good at letting people know that they are looking for options. However, SHLAA does cover sites that are deliverable.

JK	It is difficult to know what will happen in even 12 months, for example how the market will change and affect deliverability of sites. Could mean that by the time of an Examination, the evidence is out of date so need to respond to this. Also it is a political process as it becomes more ward-based and Councillors have more objections to sites.
NA	Uncertainty can be linked to windfalls - many small sites may be covered by this and can reduce the need for greenfield releases through the monitoring process. Windfalls should not be included in calculations of supply however, as for example there will not be the same level of supply in future, and now two main political parties have said they are against 'garden grabbing.' This means that there will be even less opportunity for windfalls in the future.
RTi	The flaw in many SHLAAS has been the assessment of suitability, leading for example to the removal of sites on 'ecology' grounds. Therefore the SHLAA should not be the only factor leading to Site Allocations as so many sites will come back in later that were rejected by the SHLAA on suitability grounds.
MW	SHLAA should identify a pool of deliverable sites, and it is for the Core Strategy/ Site Allocations documents to determine which of these should actually go forward as preferred sites for development. The SHLAA should not be ranking sites on issues such as flood risk, ecology and landscape.
FW	The SHLAA itself doesn't give the answer. Other information and evidence will also inform decisions, for example from the Sustainability Appraisal, consultation responses or masterplanning, These will help make decisions on which sites to take forward.
MW	Would it be for the SHLAA Panel to make decisions on sites?
FW	No, the purpose of the Panel is to help look at the broad assumptions and conclusions within the SHLAA process rather than individual sites.
NA	There may be a conflict of interest if the Panel are agreeing sites which could open the SHLAA up for judicial review.
FW	The authorities are looking to the Panel more to agree a methodology rather than agree individual sites. We will get them to declare an interest and this will be recorded in the notes of meetings.

Volunteers to join the Panel are:

Francis Whittaker (FW)	Dacorum Borough Council
Catriona Ramsay (CR)	Watford Borough Council
Joanna Bowyer (JB)	Three Rivers District Council
Jane Wakelin (JW)	Wakelin Associates
George Edkins (GE)	Hightown Praetorian and Churches HA
John Kettlewell (JK)	Land at Shendish
Ralph Thornbury	Land at Shendish
Matthew Wood (MW)	Hertfordshire County Council
	One representative from

Sue Swain (SS)	Hertfordshire County Council	HCC to attend
Andrea Gilmour (AG)	Hertfordshire County Council	
Jonathan Harbottle	Land and Partners Ltd	

Other attendees will be kept informed of progress on the SHLAA Stage 2 Review.

Part 2

There was a discussion around a number of key issues that were identified as affecting the SHLAA, covering the recession and recovery; windfalls; density and design case studies; greenfield assessment; deliverability and developability; stakeholder involvement and other issues. A number of questions were raised to stimulate the discussion.

The Recession/ Recovery

- How long do you think the recession will last and what will be the pace of recovery?
- Are some sources of sites/locations affected more than others? What types of sites might recover the quickest?
- What is your view of the market at the moment?
- How do we factor the impact of the recession into the SHLAA?
- What can local authorities do to help with the recovery?
- What have other authorities done with their SHLAAs in terms of the effects of the recession?

NA	There is a current excess of flats and very few houses and family homes are available which is a concern for the banks. Watford as a suburb of London, can possibly take flats more than other areas, and Three Rivers is so tight to develop that it is probably not a problem, but certainly in Hemel Hempstead, current commitments for flats are a problem.
NA	It is a national problem with flats that while they are aimed at first time buyers, limited deposit and mortgage availability prevent potential purchasers buying them.
GE	The same problem of deposits and mortgage availability is a problem for shared ownership properties too and means that people are buying smaller shares in the properties. While they could afford repayments, they cannot get the deposit/ mortgage for a larger share.
GE	Buy to let on flats has also been hit as properties are not seen as a good investment while prices are falling.
GE	In the past, flats have been allowed at high density and this was seen as a good thing as it saved the Green Belt and generally used brownfield land. However high density flats are not what the market wants.
FW	This may be a consequence of the supply of land. It seems that it has been town centre sites that have come forward in the past.

JK	It is a bit chicken and egg. The government says that development must be at 30-50dph so developers buy town centre sites.
NA	It is also easier to meet affordable housing requirements on flatted sites.
JK	The Government is unlikely to drop high density emphasis as it saves the countryside from development, but this may extend the problem.
NA	Banks are no longer providing developers funding for flats.
JK	Developers may still be interested in sites as there is optimism for the longer term.
NA	The view from HSBC was that we are looking at a five year recovery.
NA	There is still a problem over financing, as banks can no longer wholesale mortgages so have to go back to deposits. This means that lending ratios will have to remain relatively high in order to limit supply as the mortgages are much harder to finance.
EJ	While the SHLAA identifies sites in the urban boundary that may have come forward for flats 4/5 years ago, these will now be slow to come forward. However greenfield sites are more deliverable in the short term.
NA	Also, providing larger family housing on these greenfield sites would release smaller properties lower down the chain acting as a catalyst for increasing supply for first time buyers. However with the detached dwellings and lower density build the affordable housing element is often not achievable.
JW	Smaller sites also do not often contribute to affordable housing.
NA	If authorities want to get the market moving, s106 contributions need to be phased against completions as developers will not have the money up front.
JW	It has been that local authorities are insisting on affordable housing and s106 contributions up front.
NA	Dacorum have now agreed to drip feed s106 money on a site.
NA	The recession will affect the type of sites that are delivered. Flats are harder to deliver so over the next five years look at housing sites, and if flatted sites come forward, these can be treated as a windfall.
EJ	Authorities have housing targets to meet. If too many town centre sites are allocated in the first five years, these are unlikely to all come forward in current market conditions so it is unlikely that targets will be met. Therefore need to look to include greenfield sites earlier in the phasing to continue a supply of housing sites.
NA	Need to balance portfolio of flats with family housing to provide for the whole community.
GE	Affordable housing provision pattern has changed. It was 60-70% on 106 sites e.g. Kodak, but not at the moment although there are still some smaller 106 sites. Hightown Praetorian are compensating for this by taking on sites with builders looking for a builders profit (rather than a developers profit) and providing all affordable units, but this will not last for long. Another possible avenue is RSLs buying up land now to develop in future.
NA	Some areas have already recovered, for example Berkhamsted and Harpenden, and Watford is supported by commuting to some extent, but Hemel Hempstead (and Stevenage) much worse hit.
JK	Railway station plays a big role in helping an area, as many people in this

	area are looking to commute.
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Windfalls

- What role should windfalls play in the SHLAA?
- Should the SHLAA include small sites (say less than 5 dwellings) or should they be treated as part of the windfall supply?

NA	The SHLAA should not include windfalls as cannot calculate it. If windfalls do occur, the release of greenfield land in the future can be regulated through monitoring. There will not be the same supply of windfalls in the future as many sites have already been developed.
EJ	The recession has also affected windfalls so cannot assume that windfalls will continue at the same rate as in the past. Including windfalls in the SHLAA defeats the purpose of a SHLAA.

Deliverability/developability

- We have assumed a healthy delivery of sites throughout the SHLAA. Is this a reasonable approach?
- Is the SHLAA sufficiently clear as to the deliverability / developability of each identified site?
- Does the study adequately deal with how constraints could be overcome and when?
- When should rejected sites be revisited?
- In Dacorum, we have revisited unphased sites and looked at including some sites in years 15-20. Is this a reasonable approach?

FW	The SHLAA assumes a fairly health delivery of sites, but is this a reasonable assumption?
JK	Should not assume that there will be future troughs in the market as do not know what will happen in the future.
NA	Have to assume supply.
JK	Need to consider what will be delivered. If it is family housing that is deliverable, it is no good assuming that 50dph will go forward and be delivered.
GE	There is always an overhang from boom times, e.g. Kodak will not be completed until 2011/12 and will provide a lot of flats, but conceived in 2004.
NA	It takes a long time for schemes to go through planning.
JW	The fact that more households are being formed as a result of demographic changes means that there will be demand for properties in a separate way to price.
NA	To help the market, authorities should allow developers to pay twice the statutory fee for a better planning service, for example speeding up consultations and committee meetings which would help speed up the planning application process and the delivery of sites.
NA	Experience of Examinations shows that Inspectors will be looking at the analysis.

Density/design case studies

- Are there any specific issues around densities/case studies used to assess housing capacities and how they were applied?

JK	Higher density sites should stay in the SHLAA, but the phasing should just be pushed back.
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Greenfield assessment

- Do you consider that the approach the SHLAA took to the assessment of greenfield sites was reasonable?

EJ	Many of the greenfield sites have been phased in the 6-10 years category, but should probably be moved forward as, particularly in difficult economic circumstances, these will be the ones that are more likely to be deliverable soon.
GE	At the meeting on Dacorum's Core Strategy about a year ago, the attendees agreed that it would be easier to provide larger greenfield sites as new neighbourhoods rather than piecemeal smaller sites.
SS	Larger sites also make it easier to plan for infrastructure provision. For example, provision of schools would be easier on larger sites not incrementally increasing classrooms on existing sites.
EJ	Large sites could be allocated for development, and then developed in a piecemeal approach to allow phased infrastructure contributions.
JK	Local authorities need to be aware of the demands on developer finances and allow phased contributions to facilitate development rather than hinder it.

Others

Did the SHLAA miss anything fundamental out?

Are there any other significant sources of supply that we should cover?

How would you see the SHLAA being related to other technical work e.g. the SHMA, DES, Gypsy and Travellers study (Scott Wilson) and employment land supply?

No issues were raised.

7. Stakeholder involvement

Are you happy with the stakeholder arrangements proposed?

No issues were raised.

Appendix 7 Comments from CGMS regarding greenfield selection criteria

South West Hertfordshire SHLAA (October 2008) & Spatial Strategy (& Associated Sustainability Appraisal) for the Village of Bovingdon (June 2009).

This note evaluates the greenfield assessment short listing criteria of the SHLAA against both the Bovingdon Spatial Strategy and the associated sustainability appraisal that has been undertaken on it, in order to test their robustness.

The Spatial Strategy for the village of Bovingdon sets out four options for development within or adjacent to the village. These four options are: Option 1 - Duckhall Farm; Option 2 - Rear of Green Lane; Option 3 - Grange Farm & Option 4 - North of Chesham Road.

The SHLAA was completed prior to the Spatial Strategy being made available for public consultation in June 2009. The SHLAA rejected both the Duckhall Farm (Option 1 -SHLAA ref: BOV52) and the Rear of Green Lane (Option 2 - SHLAA ref: BOV53) options for the reason they 'fail on Dacorum Greenfield Suitability Criteria'. The Grange Farm (Option 3 - SHLAA ref: BOV70) option site was accepted, with the North of Chesham Road (Option 4) site not appearing to have been considered within the SHLAA. The note will therefore focus on sites 1 to 3, given they were considered by both the SHLAA and the sustainability appraisal.

SHLAA

It is considered that the SHLAA lacks transparency on the basis that very limited information is given within the document as to why sites have failed to meet criteria. Within the SHLAA, para 3.3.12 sets out that all greenfield sites were assessed against two sets of criteria to see if a site was 'suitable'. The document notes that these two criteria were: 'Assessment A' - a physical assessment of suitability and 'Assessment B' - a sequential assessment of suitability based on nationally and locally-formulated sustainable development criteria.

Whilst no clear guidance is given as to what specific criteria the Duckhall Farm (Option 1) and Rear of Green Lane (Option 2) sites failed on, an assumption is made that they must have been rejected under Assessment B (assessment of suitability based on nationally and locally-formulated sustainable development criteria), given that the reason notes local (Dacorum) criteria, with Assessment A being a physical criteria based assessment.

Having reviewed the Category B Greenfield Assessment criteria of the SHLAA (paras 3.3.15 - 3.3.24), it is apparent that there are 5 key criteria (A-E) under which sites were considered.

1) Criterion A (Para 3.3.18) The first of these five criteria states that sites must abut designated settlement boundaries, with the text noting that they must be accessible to key facilities and jobs.

Having reviewed the Proposals Map of the Local Plan it is apparent that sites 1, 2 and 3 all abut the defined boundary settlement. Within the Sustainability Appraisal (SA) for the Spatial Strategy (SS), SA objective 13 (sustainable locational development) sets out that sites 1 and 2 would have a positive impact, whereas site 3 would have a minor adverse impact due to being located further from the village.

2) Criterion B (maintenance of the settlement hierarchy) states that any site should be rejected that is clearly inappropriate in scale to the settlement, noting that there may be scope to consider small parcels of land where they might better relate in scale to that settlement.

Within the SA for the SS, SA Objective 11 (landscape and townscape) considers the impact of the three sites, with all three being classified as having a minor adverse impact. All 3 sites are assessed as forming an important part of the countryside. Given that the criterion allows for the size of sites to be adjusted, this assessment shows no material difference between the 3 sites.

3) Criterion C - Strategic Growth in Hemel Hempstead. This criterion notes that sites over 5ha in size and located away from Hemel Hempstead were normally considered as less suitable.

Having reviewed the SHLAA, it is apparent that Site 3 is 7.996ha in size, exceeding this 5ha limit. Similarly Site 1 is over this site threshold (being 8.1ha), with it being assumed that site 2 is similarly over this 5ha limit (although no site size is given within the SHLAA or SS). Given that Site 3 was put forward within the SHLAA, it is assumed that application of this criterion did not result in sites 1 or 2 being discounted, as these are both similar in size and location abutting the settlement.

4) Criterion D - Greenfield Sites on the edge of other towns and larger villages. The criterion notes that for the purposes of the SHLAA, such sites should be considered (as there may be the possibility of greenfield release), with the text noting that there will be more limited opportunities in the larger villages in terms of 'modest growth'. Para 3.2.22 notes *"what constitutes 'modest growth' may be assessed on a case by case basis, as at the time of setting the greenfield assessment criteria, the size and location of the greenfield sites that would be submitted were as yet unknown"*

Given the similarity in site size between sites 1 (8.1ha) and 3 (7.996ha) it is considered that there is no material difference between the two in terms of being 'modest' The site size for site 2 as stated earlier is not known.

5) Criteria E - Rural Exception sites - this is not relevant to sites in Bovington.

Overview

	Criterion A	Criterion B	Criterion C	Criterion D	Criterion E
Site 1 (Duckhall Farm)	✓✓	✓	✓	✓	N/A
Site 2 (Rear of Green Lane)	✓✓	✓	✓	?	N/A
Site 3 (Grange Farm)	✓X	✓	✓	✓	N/A

Conclusions on SHLAA

Having reviewed the criteria within Assessment B of the SHLAA against both available information on sites 1,2 & 3, as well as the SA for the SS, it is apparent that there seems to be inconsistency in how site 3 was accepted for development, while sites 1 and 2 were rejected within the SHLAA. We consider that the lack of transparency in the SHLAA Greenfield site assessment process is a critical flaw that will impair the use of the SHLAA as part of the evidence base for the preparation of DPDs. If data summarising the assessments for individual sites is not available for public scrutiny, we consider that at the very minimum a statement should be included in the final SHLAA report to the effect that (a) the SHLAA is only one source of information on potential housing sites, (b) the exclusion of a site during the SHLAA process would not preclude it from being given further consideration during the DPD-preparation process, and (c) any site identified within the SHLAA as potentially suitable for housing will be subject to a more detailed sustainability appraisal during the DPD preparation-process which may conclude that there are other more suitable sites.

It is considered that the SA undertaken for the SS of Bovingdon represents a more transparent and clear method of identifying the suitability of potential sites for development.

Sustainability Appraisal of Core Strategy

Whilst we consider that the current SA for the CS is both more transparent and more comprehensive in methodology terms than the SHLAA, we consider that further refinement should be undertaken to the SA. Refining the SHLAA Greenfield site assessment in line with the approach taken to date in the SA for the SS, will not be sufficient to overcome the limitations identified above for the following reasons.

National planning guidance on sustainability appraisals is set out within the CLG document 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (2005).

We consider that the methodology of the SA for the Dacorum Core Strategy should be improved with a refined assessment, responding to representations made in the recent round of public consultation that took place in August 2009. Such an approach would be consistent with para 3.1.12 of the above CLG document which sets out that *"it is recommended that public and stakeholder involvement on the SA is undertaken concurrently with consultation on the DPD. It is crucial to combine the consultation requirements for the preparation of the DPD with the SA process (see figure 7)"*. Figure 7 sets out guidance on public involvement in DPDs and SA noting that in terms of pre-submission participation *"follow the advice in PPS12 for DPDs, ensuring that the relevant SA information is consulted on at the same time as the options of the DPD"*.

The CLG document sets out the stage by stage preparation of an SA (Stages A, B, C, D & E), and SA. Stage B: Developing and refining options and assessing effects (paras 3.3.1-3.3.23) is considered to be of particular relevance.

The document sets out that broad strategic options should be considered initially, with these options being revised to take account of the appraisal findings and consultation responses. Para 3.3.9 then sets out that as each option is refined, commentary on the key sustainability issues and problems arising must be prepared, with recommendations on how each of the options could be improved, e.g. through mitigation measures.

In terms of predicting the effects of the DPD within the SA, paras 3.3.12 - 3.3.13 of the CLG guidance states that *"Predictions should be supported by evidence, such as reference to any research, discussions or consultation which helped those carrying out the SA to reach their conclusions"*. We would welcome such an approach, given the lack of detailed information and evidence within the SHLAA.

In our representations in August 2009 on the CS, we highlighted concern at the 'broad brush' approach of both the DPD and SA by virtue of the fact that they failed to consider any form of mitigation, particularly with regard to ecology matters. Within the CLG document, paras 3.3.20 and 3.3.21 are set under the title of 'Considering ways of mitigating adverse effects and maximising beneficial effects'. Para 3.3.20 states that *"the SA report must include measures to prevent, reduce or offset significant adverse effects of implementing the DPD"*. Para 3.3.21 then states that mitigation can be in various forms, including *"technical measures to be applied during the implementation stage, e.g. buffer zones, application of design principles"*. In line with our previous representations, we consider that such an approach should be adopted within the drafting of the next stage of the CS and associated SA.

CGMS March 2010

Appendix 8

SOUTH WEST HERTFORDSHIRE STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT – STAGE 2 REVIEW

2nd Meeting 18th February 2010

10am Gade Room, Civic Centre, Hemel Hempstead

AGENDA

1. Welcome
2. Aims of the morning
3. Declaration of interest of panel members
4. Discussion around sites:
 - Commitments
 - Housing in residential areas
 - Employment land
 - Town and local centres
 - Community uses
 - Urban open spaces
 - Rural sites
 - Greenfield
 - Other opportunities
5. Conclusions and identification of any site(s) requiring further discussion
6. AOB
7. Confirmation of next meeting if necessary

Appendix 9

DISCUSSION BY TYPE OF SHLAA SITE

Type of site	Examples	Questions
Commitments	<p>Unimplemented planning permissions</p> <p>Applications with uncompleted s.106 agreements</p> <p>Local Plan allocations (with or without development briefs)</p>	<p>What is the panel's view on general approach to use of these sites?</p> <p>Do they think it is reasonable to carry all unimplemented allocations forward?</p> <p>Are there any particular issues that should lead to any commitments not being carried forward if identified?</p>
Housing in residential areas	<p>Infilling/back gardens in established residential areas</p> <p>Large-scale redevelopment and redesign of existing residential areas</p> <p>Garage blocks</p>	<p>What is their view on back garden development opportunities?</p> <p>Should ownership details be available for every site for them to be included in the SHLAA?</p> <p>Do they see this as a reducing supply or are there still areas where it is considered that there are still significant opportunities for housing in residential areas?</p> <p>We have only tended to carry forward and allocate phasing to sites where we know there is landowner interest. Do they agree with this approach?</p> <p>Should lack of ownership details/ knowledge of owners intentions lead to sites being non-phased?</p> <p>Did they consider there are any realistic opportunities for large-scale redevelopment and redesign of existing residential areas? If so, which areas?</p> <p>To what extent can RSLs continue to make up for the private market not delivering such sites during the recession?</p> <p>The SHLAA has only taken forward garage blocks where they are not in active use and /or there is active interest in promoting</p>

		<p>sites (e.g. HPCCHA). Do you agree with this approach?</p> <p>On the basis of practicality, the SHLAA has not identified redevelopment of existing residential properties (e.g. 2 houses to 10 flats) unless there is information about developer interest. Do you agree that this is a reasonable approach?</p>
Employment land (excluding town and local centres)	Land in commercial use and outside of industrial estates Industrial estates	<p>Tribal Urban Studio has generally assumed that employment land should be safeguarded. Do you agree with this?</p> <p>Where only part of an employment area is developed for housing, can the two uses reasonably coexist?</p>
Town and local centres	<p>Large scale office conversions</p> <p>Living over the shop</p> <p>Mixed use opportunities</p> <p>Car parks</p> <p>Public houses</p>	<p>Do they see a future market for converting / redeveloping offices for housing?</p> <p>Are smaller (LOTS) schemes still attractive?</p> <p>The SHLAA has either rejected sites or placed them in the no phasing period where there is a loss of parking to serve a local centre. Do you agree with this?</p> <p>Where there is no information that a site will come forward and it is currently in active use, the SHLAA has not phased these sites. Do you agree with this approach?</p>
Community uses	<p>Former school sites</p> <p>Sports facilities</p> <p>Social and community uses</p> <p>Halls</p>	<p>How should we deal with former local authority and County Council community facilities?</p> <p>If sites (such as schools) are available, should we assume that all of the land (including open parts of the site) will be developed?</p>
Urban open space	<p>Leisure facilities</p> <p>Sports ground</p> <p>Incidental open space</p>	<p>How should we deal with the loss of leisure facilities to housing?</p> <p>The enabling development is often used to improve future facilities.</p>

		Can we reasonably assume the loss of leisure facilities if there is a reasonable opportunity that they would be replaced?
Rural sites (Dacorum and Three Rivers)	Within small settlements Rural exceptions	Is it reasonable to assume that there will be a need for rural exception sites in most selected villages in the Green Belt and Rural Area over the next 20 years? What scale is reasonable to assume for in rural exception sites? Should we allow for larger infill opportunities (i.e. of 2 or more homes) in villages in the Green Belt (e.g. Chipperfield, Flamstead, Potten End, Sarratt and Bedmond?)
Greenfield (Dacorum and Three Rivers)	Urban extensions Stand alone greenfield sites	The SHLAA has left policy decisions on the choice and mix of larger greenfield sites to each authority outside of the SHLAA itself. Do you agree with this approach? The SHLAA has rejected standalone (isolated) greenfield sites where not abutting a designated settlement. Do you agree with this approach? Should we assume a standard rate of delivery for larger greenfield sites? If so, what should this be? The SHLAA assumes modest densities for the larger greenfield sites to recognise the need to provide for other non-residential uses. Do you agree with this?
Other opportunities	?	Are there any other types of sites the panel would like to discuss?

Appendix 10

DISCUSSION BY TYPE OF SHLAA SITE - PROFORMA

SITE IDENTIFICATION:	
1. SITE SUITABILITY	Questions
Policy restrictions (e.g. designations, protected areas, existing planning policy) Exclusion of sites requiring special protection e.g. AONB, SSSI and Ancient Woodland from the assessment Does the site encroach upon local, national or international biodiversity sites or mineral resources?	What specific policies might restrict this group coming forward e.g. safeguarding employment land? Do you agree with the SHLAA excluding sites affected by these designations from further assessment?
Physical problems or limitations e.g. access, flood risk, contamination, topography, and infrastructure deficits etc.	Is the assessment of flood risk satisfactory? Did the SHLAA consider / assess all constraints?
Potential impacts e.g. effect upon landscape features or conservation area.	
Sustainability criteria	Can the site be accessed by public transport? Does it have a suitable access onto the existing highways network? Does it relate well to existing services and facilities?
Environmental conditions experienced by prospective residents / compatibility with adjoining uses / air quality.	Would residential development of the site be compatible with existing and / or proposed adjoining uses?
Should the group be considered suitable for development? Y/N	What are key issues affecting the group?
How can constraints / problems be overcome?	
2. SITE AVAILABILITY	
Ownership constraints?	Can sites still be delivered if in multiple ownership?
Landowner intention known?	Should sites be removed or put back if there is no known developer intention?
Buildings occupied and land in use? Can the use(s) be relocated in a reasonable period of time?	

Planning status	Should we still include sites where planning permission has expired or refused?
Should the group be considered suitable for development? Y/N	What are key issues affecting the group?
How can constraints / problems be overcome?	
3. SITE ACHIEVABILITY	
Is the group constrained by market factors?	Is there a stronger market for this group in certain settlements? Has the recession affected this group coming forward? Will it prove attractive to develop during the recovery?
Is the group constrained by financial / cost factor?	Are there specific infrastructure costs associated with the group? What is the impact of the level of affordable housing on the delivery and attractiveness of the group? Will the group attract specific costs in order to overcome the physical constraints? Cost/price ratio? How might planning obligations affect the viability of schemes?
Is the group constrained by delivery factors?	Is the group affected by phasing, build out rates, size and capacity issues? How should this be reflected in the phasing of sites in the schedules?
What is the most attractive form of residential scheme for this group of sites?	Is a particular form of development more likely and is it one that can be delivered by the market?
Is there an alternative to residential development?	Could an alternative use prove more attractive than residential e.g. continuing with commercial uses on employment land?
Should the group be considered achievable? Y/N	What are key issues affecting the group?
How can constraints / problems be overcome?	What steps can be taken to in order to overcome

	any financial / market / viability problems? Need for independent financial appraisal of viability?
4. OTHER ISSUES ARISING	
Are there any other issues not already covered above that should be discussed e.g. densities, design case studies?	
5.DELIVERABILITY/DEVELOPABILITY CONCLUSIONS	
Is the site suitable, deliverable and developable?	
When will the site be delivered?	Are there any phasing issues?
What steps need to be taken to overcome constraints?	

Appendix 11

Notes of South West Hertfordshire SHLAA Stage 2 Review Stakeholders Meeting

2nd Meeting 18th February 2010 at Dacorum Borough Council

In Attendance:

Francis Whittaker (FW)	Dacorum Borough Council
Catriona Ramsay (CR)	Watford Borough Council
Joanna Bowyer (JB)	Three Rivers District Council
John Kettlewell (JK)	Land at Shendish
Ralph Thornbury (RTh)	Land at Shendish
George Edkins (GE)	Hightown Praetorian and Churches HA
Jane Wakelin (JW)	Wakelin Associates
Jonathan Harbottle	Land and Partners Limited

1. Apologies

Apologies received from Andrea Gilmour, Hertfordshire County Council.

2. Introduction

FW explained that the aim of the meeting was to take forward broad issues tackled at the first meeting and begin to look at specific groups of sites. It was not practical or convenient for the Panel to consider all of the accepted sites. There were too many of them, and the SHLAA has already been published. He explained the agenda for the meeting, setting out the order of the sites to be discussed, the purpose of the pro-forma in ensuring main issues were covered, and the example sites for discussion. The outcome of the morning would help the three authorities draw conclusions about the way the SHLAA had treated groups of sites.

FW asked if any panel members wanted to declare an interest in any of the SHLAA sites.

GE – Only deals with affordable housing, and therefore interested in any sites that would have that element, but no legal interest in any SHLAA sites.

JW – Delta Gain in Three Rivers and the Gade Avenue site in Watford.

JK – Shendish Manor, and other sites in the area which are not in the SHLAA.

RTh – Shendish Manor.

3. Initial discussion

JW asked how had the employment studies fed into the overall process? Should employment sites not have been looked at first before the SHLAA as how can decisions be made about employment sites without knowing whether they are needed?

FW – The SHLAA is only one piece of evidence, and is a starting point for Local Development Framework decision-making.

JH – If a site is a non-starter, then will fall at the first hurdle.

JK – Authorities are required to provide housing land, and will also need to provide employment land.

JK– The inclusion of a site in the SHLAA means that the site is available and suitable, but not necessarily permissible.

GE – The SHLAA should be policy-neutral, therefore ignore Green Belt, employment policy and just identify what 'could' be possible, and policy decisions will be made later.

JK – Perhaps the question should be whether a site is well located for employment? If a site is not well located in relation to access, public transport, vehicle delivery and servicing etc., then consider suitable for release to residential.

JH – Council resources are an issue, so wherever possible get private practice to help and contribute information?

4. Discussion on groups of sites

a) Commitments

FW – The SHLAA includes a number of commitments that we know about. Is it acceptable to include sites in the SHLAA with planning permission or previous Local Plan allocations?

GE – The SHLAA covers 20 years- why not include, unless strong reason not to.

FW – If planning permission on a SHLAA site has expired what is reasonable to do with it?

JW – Sites that lapse still should be okay, especially as the SHLAA includes other sites without planning permission.

JK – Unless anything has changed or policy, then yes.

JH – The SHLAA is policy neutral anyway, so yes.

JW – You can always assume that if there is a chance people can make money then sites should go forward.

b) Housing in Residential Areas

Site BOX3 was used as an example to discuss issues.

GE – There are ownership issues with the BOX3 site in the form of ransom strips, and access will have to come in off Sunnyhill Road. Slope may also be a problem. Someone trying to assemble parcels of land, but will take a long time. The site is blocked with access as the developers didn't think ahead.

Criteria, number of owners. Longer time frame, but with later phasing takes years. This market there is not as much funding.

JW – If slope is a problem you could reduce density. There is a need to look at densities you could get out of the scheme. Way of regulating risk, over simplistic view. Back garden needs a longer time frame in terms of enquiry to owners.

JK – If a site is difficult to develop, it may go in a strong market, but otherwise will need a longer timeframe.

JH – Site may not happen soon, but rolling review of SHLAA so could include in 6-10 years.

GE – In considering issues that may prevent sites coming forward, multiple-ownership is a key concern. More than one owner means that problems not just doubled they are squared. These back gardens can be phased, but not really worth developing.

JW – Comes back to the problem of not initially looking at all potential sites on good planning grounds – not just the ones that have put sites forward.

JK – If there are sites where owners' intentions are not clear, or there are multiple owners it could cause problems at Examination if people appear and say that they would never sell. Strikes at evidence base if there are people who don't want to sell land.

JH- It would be okay if only a few sites are like this, and not included in five year supply of land.

FW - Garage blocks have only been included where we know they will be coming forward.

GE/JK/JW – Agree with this approach.

GE – Supply is likely to reduce in future as less constrained sites have already been developed.

JH – The situation is the same with parking in general. Roger Tym study in the 1990s found parking is diminishing resource - now it has flipped and we need parking.

JW/GE/JK/JH – All agreed that they did not see that there is any potential for large scale residential redevelopment in this area.

JW - If a new Government gets elected we can see what happens with backland development!

JH – Although back gardens may not be classified as PDL anymore, so cannot be automatically developed, they may still be a better option than greenfield.

JK – Issues of numbers will come to the fore. Back gardens will be a dwindling supply the more recent the housing.

GE – A lot of potential for taking three or four 1930's houses and developing 14 flats. There is potential for this in Watford and Three Rivers.

GE – Low thresholds for affordable housing are not seen as helpful, and better to have a financial contribution. While 6-12 houses were reasonable, small sites of 1-2 houses are expensive to run and build. Lower thresholds produce smaller returns. Harpenden has seen a lot of luxury housing, should take money in some sites.

JK – Lower thresholds also make sites less attractive to private developers.

c) Employment land

Site BC41 and KL38 were used as examples to discuss issues.

FW - Housing growth needs to be balanced with employment. The SHLAA is not the only source of information. It represents a long list of potential sites, and forms part of the evidence base, with figures being refined all the time.

JW – The office market is currently on its knees, and will be the last thing to recover coming out of the recession.

JK – However, within the timeframes of Core Strategies the ups and downs of the office market may not be an issue.

FW - Site KL38 is vacant and on roundabout. Should it be used for commercial purposes or alternative non-commercial uses?

GE – The principle should be that is this a badly located building and will it always be undesirable in the future? If the answer is no, it should remain as employment. Is it a poor quality building and unsuitable for offices. For example Kodak was unsuitable as floor to ceiling heights were wrong, so has been converted to residential. Is it fundamentally redundant?

It is well located and easily accessible? As an employment building is it run down and can it be used as residential?

JW - Nature of employment has changed, shopping has changed, need to look at changing these types of sites. Old policies are still being used within plans that need to be updated.

FW – many sites don't fit neatly into categories, and may need more flexibility i.e. car show rooms are not easy to fit in to a type.

FW – If there is an older employment area would they consider it suitable to develop only half the land for residential?

JW Doesn't really work if you have to go through industrial land to get to housing which will be difficult to sell.

JK – Although it may be better to have a mix of uses, it could be difficult to get the average person to buy the houses.

FW- For example, Ebbens Road, Hemel Hempstead is half developed and the landowners of the Frogmore Road GEA are looking to promote the eastern end of the site for housing.

JW – There was a site in Three Rivers that the Council would not allow to be developed unless it was the whole site.

GE – The site in Frogmore Road has a nice outlook, but having industrial uses next to the site needs to be taken into account, particularly at night. Having to drive or walk through industrial areas to get to housing at night is not desirable. That is not to say that you couldn't mix employment and housing; for example flats with office suites or ground floor retail are very acceptable. Certain parts of town are becoming dead because no one lives there.

RTh – The problem is you can't second guess the next 10-15 years and how employment market will fare. You can't force people to walk to work, but it is a good idea.

FW – In terms of alternative uses, is commercial still attractive compared to housing?

JW – Generally, most of the past few years have been working on changing employment to residential. If you could get offices (in the old days) this was the best, with as little parking. Now problem is planners saying no to parking where in actual fact parking is needed. Even though currently a massive wobble, housing is still the main priority, during the boom housing always trumped everything apart from supermarkets, and is a reliable long term need.

GE – Residential land values have approximately halved, but everything else has also dropped so still value in residential.

JK – Clients are now looking for a small proportion of commercial development on sites. They are working on an assumption there will be a recovery and commercial will follow housing, but only looking for a small proportion as not sure what will happen.

JH – In some locations/cases, once affordable housing requirements have been taken off, employment uses may provide better returns.

Maylands, in Hemel Hempstead for instance, is struggling to attract the mix of uses to the business area that it really requires.

Employment rebalancing happened in big boom in last 10 years. Viability is going to be much more important when the CIL comes through. The range of contributions is getting broader.

GE – The question is, will residential still trump other uses when CIL, and higher sustainability standards are required? If there is no levy on employment uses, this may mean employment is more viable.

JK – In London, the Mayor is imposing floorspace standards, which may depress residential profits. May be easier to do sustainable offices rather than houses.

JW – Land values have shot up and residential is still selling as we are on the edge of London and it is still a competitive market.

JW – Watford has always been very good for commercial development and Hemel Hempstead for warehousing. Hemel is more likely to have potential for conversion from employment as a result of the increased warehousing.

GE – Once developers get into arguments about economics and viability, it will slow down the process and the cost of arguments will mean that smaller sites will not come forward. The transaction costs of changing from one use to another are increasing.

JK – Sustainability will be the issue for employment land. If in a very sustainable location, should remain as employment land.

d) Town and local centres

Site BC41 was used as an example to discuss issues.

FW – Are opportunities for residential above shops still attractive?

JK – There is still a market for these.

GE – Only a limited number of businesses would want offices over shops.

JW – The resale value of flats above shops is lower so there is more demand currently.

GE – Problems with getting mortgages for flats above shops at the moment, including Buy to Let mortgages. Banks just won't take it at all, though this may not last.

Why are other sites not included in the SHLAA? What were the criteria for how they were assessed and put in the sites that they did?

GE – BC41 involves mixed use. Centre of Berkhamsted is desirable to build.

JH – Councils have limited resources, but if trying to bring forward site, would be good if owners were contacted with a copy of site information to check if it is correct or whether they can add anything.

FW – There is already a development brief on the site. Accept that the Councils should be more proactive in contacting site owners.

JH – Also speak to DC who can comment on SHLAA and update.

FW – It is self fulfilling if it's in the SHLAA. Environment Agency problem is they tend to have a blanket response to flood risk and err on the side of caution.

e) Community uses

GE – Schools are the current big issue, and have been a big source of housing in the past.

JW – Dealings with HCC suggest that they are now looking for new school sites so cannot count on school sites coming forward in future. Journey to school distances not as such a worry as shortfall.

FW – Is it reasonable to include community uses in the SHLAA?

JK – As long as there is intent to develop then should be in the SHLAA.

GE – If do take e.g. school sites forward, question over whether to take whole site forward or just the built footprint?

JW Should use all of a site.

JK – To release whole site, need green infrastructure study to establish whether the area needs open space etc. If not, should include whole site.

Pupil numbers going up for schools can only provide certain estimates.

JH – Don't put every school site in, otherwise would have to assess all sites, but include if there is some indication that there is intention to develop.

JH – It's reasonable to include sites, but not in the first five years.

GE – It is important to reflect on whether there is a need for open space or not to decide on how much of the site is developed.

JW – If it is a community building, it will be necessary to prove that it has been on the market.

GE – That is a policy issue, but in terms of whether sites may be suitable- yes.

JH – Not sure that sites could even be in 6-10 years unless there is known detail- whether site will be released, how much of site etc.

Vincent and Gorbing could be available typical site i.e. school with playing field. Do you take footprint of the site or whole area?

f) Urban open space

Site LG 42 used as an example.

GE – The question is over whether the site is suitable for residential. Site is surrounded by residential, so yes.

FW - Do you allow whole thing to go?

JW – Would have to rely on DC policy control to get best value from site.

GE – Would there be a different approach to public facilities as opposed to private facilities. Are these both to be included?

JK – It may depend on whether there is a need for open space, and then it would not matter whether it was public or private. The role of open space should be assessed if it is providing more than amenity value and open space study needs to be fed into the process.

GE – St Albans rugby club relocated to outskirts of St Albans with improved facilities.

JW – Figures for capacity should reflect whether, for example there is an open space deficiency. If so, capacity should be reduced. For example, if a tennis club wanted to sell, dwelling capacity at the moment is 70. Need to be clear this is just a provisional dwelling number.

FW – The Site Allocations document will include capacities.

JK – Important that anyone picking up SHLAA knows that it is not an allocation. The only figure that can reasonably be taken from it is the mid-point capacity.

Open space provision needs to be kept in mind for example in Hemel would be too much.

How to take it forward, what level of detail and at what point? Have to make sure people don't cherry pick dwelling capacities.

JH – Wherever possible, throw information back to developers and land agents, to check capacity and phasing information. Find out what work they have done on any sites and get dwelling densities. Throw it out to DC and open space officers etc. and get as much information as possible.

g) Rural sites

GE – In the past, Local Plan Inspectors have said that rural exception sites should not be included as allocations as they should be exceptions and should come forward on their own merits.

JH - Against rural sites going in SHLAA, could come forward after site allocations, although not going to be that many.

JH – If looking at rural sites, would have to go back and look at all sites in the village and include on planning merits.

JK – The SHLAA could anticipate a number of units from an area, but not identify specific sites.

GE Can assume that the need for housing will continue.

GE – If a site is on the edge of a village with a centre excluded from the Green Belt, then include in SHLAA, but if a Green Belt village, then may say that there could be e.g. 20 rural exception units but not identify site.

JK – Anything other than for local needs should not be in the Green Belt.

It is hard to get sites through planning.

JH – If there are non conforming sites i.e. garages, then these should be looked at.

GE – Although the SHLAA guidance says that the SHLAA should be policy neutral, this should not ignore Green Belt/ rural exceptions policy.

h) Greenfield

FW – The point has been raised that the SHLAA does not currently identify which greenfield criterion a site has been rejected on.

JH – Should include this information to identify constraints to development.

FW – In taking forward the SHLAA, Dacorum has separated out the greenfield from the urban capacity.

JW – It is reasonable to separate out greenfield sites as a pool to dip into.

FW – Large greenfield sites not abutting settlements have been rejected.

JW / GE – They agree with this approach.

JW / GE – They also agreed the approach to lower densities on greenfield sites reflecting need to provide infrastructure.

JH If developers have produced information on a site including capacity, and this is based on information from e.g. HCC on the need for infrastructure, then use this number if it is evidence-based.

JH – May be difficult to get from a master plan, but with a sketch layout can use information from developers on capacity.

JW – Need to use own experience to inform capacity if better information, who has looked at the site.

JH – There has been a study on phasing of sites, which has analysed all big schemes and development rates. Years 0-3 are taken up with admin. Then as an indication delivery may be 1 a week (4 a month target figure), producing 50-60 dwellings a year, or if it's a really big scheme where plots have been sold off up to 120 a year.

GE – Any large sites have long lead in times.

JH – Years 3 or 4 is when development of dwellings actually starts, and may have 20-30 units a year. In years 5+ you can get 50-60 units.

JH - The first year is not a delivery rate. You have to factor in lead in times and infrastructure lead in times. The first building takes about 3 years.

GE – Big sites generally are consortium developments, so if each developer is building at a rate of 1 dwelling per week, the question is what is the capacity of the market to absorb these dwellings?

JK – Developers often have to sell off plots to get capital back.

FW Generally, there is a requirement for increased affordable housing on greenfield sites, is this a factor affecting the delivery of units.

GE – Greenfield has a low existing use value so assume that it can support more affordable units, but means house builders may not get same price for market housing (social rented rather than shared ownership). This won't stop sites coming forward though.

5. Other points

FW – Any feedback on specific sites that have not been looked at as examples is welcome after the meeting.

No additional sites were suggested to FW by the panel to merit a further detailed assessment at a future meeting.

Appendix 12 Greenfield criteria assessment – rejected sites

The tables below represent Officers' interpretation of the SHLAA consultant's application of the greenfield selection criteria (see pages 23-25, Final Report: Volume 1, SHLAA).

a) Dacorum

SHLAA reference	Site	4a Physical suitability	4b Sustainable development locations				
			a) Abut designated settlement	b) Maintain settlement hierarchy	c) Strategic Growth in HH	d) Edge of other towns or larger villages	e) Rural exceptions
ASH1	The Orchard, Little Heath Farm, Little Heath Lane	✓	x	✓	n/a	x	x
BC14	Ivy House Lane	x	✓	✓	x	✓	n/a
BE23	Land south of Hall Park	✓	✓	✓	x	x	n/a
BE24	land west of Ashlyns Lodge	✓	x	✓	x	✓	n/a
BE26	land east of Ashlyns Lodge	✓	x	✓	x	✓	n/a
BW27	Brickhill Green (off Shootersway)	x	x	✓	✓	✓	n/a
BW31	Playing fields off Chesham Road	✓	✓	✓	x	✓	n/a
BOV52	Duck Hall Farm	✓	✓	✓	x	✓	n/a
BOV53	Land off Green Lane	✓	✓	✓	x	✓	n/a
BOV62	Former Friends at Hand pub site	✓	x	✓	n/a	x	x
BOV63	Bourne End Lane	✓	x	✓	n/a	x	x
GAD45	Piccotts End pumping station	✓	x	x	x	x	x
HHC77	Land between Gadebridge Lane and link road	x	x	✓	✓	n/a	n/a
KL43	Rectory Farm, Rectory lane	x	✓	✓	✓	✓	n/a
KL44	Site on Rucklers Lane	✓	x	✓	✓	x	n/a

Dacorum Borough Council, Three Rivers District Council, and Watford Borough Council's stage 2 review of the South West Hertfordshire Strategic Housing Land Availability (July 2010)

KL45	Kings Langley	✓	✓	x	x	✓	n/a
KL45	Kings Langley	✓	✓	x	x	✓	n/a
KL46	Kings Langley	✓	x	x	x	✓	n/a
KL47	Kings Langley – royal hunting lodge	x	✓	x	x	✓	n/a
TC34	Land north of Icknield Way	✓	✓	✓	x	✓	n/a
TE14	Dunsley Farm	✓	✓	✓	x	x	n/a
TE16	Grove Road	✓	✓	✓	x	x	n/a
TE18	Marshcroft Lane	✓	✓	✓	x	x	n/a
TW45	Icknield Way	x	✓	✓	x	x	n/a
TW47	Land at Rosebarn Lane	✓	✓	✓	✓	x	x
TW53	Miswell Farm	x	x	x	x	x	n/a
TW55	Land at Astrope Lane	x	x	✓	✓	✓	x
TW56	Land at Marston Place, Chapel Lane	x	✓	✓	✓	✓	✓
TW57	Land south west of Wilstone	✓	✓	✓	✓	x	x
TW64	Tring Road, Wilstone	✓	✓	✓	✓	✓	✓
WA42	Site of Singlets Lane, Flamstead	✓	x	✓	✓	✓	x
WA43	Site of Singlets Lane, Flamstead	✓	x	✓	✓	✓	x
WA44	Land opposite Bowling Cottages, Chequers Hill	✓	x	✓	✓	✓	x
WA52	Foxdell Farm, Luton Road	✓	x	✓	✓	x	n/a
WA53	Site between Pepsal End Road and the M1	✓	x	x	x	x	n/a
WA54	Site between London Road and the M1	✓	x	x	x	x	n/a
WA56	Site to south of Potten Hill Road (Rumblers Farm)	✓	x	x	x	x	n/a

WA57	Site to south of Potten Hill Road (between Potten End Farm and Woodcroft Farm)	✓	x	x	x	x	n/a
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b) Three Rivers

SHLAA reference	Site	4a Physical suitability	4b Sustainable development locations				
			a) Abut designate d settlement	b) Maintain settlement hierarchy	c) Strategic Growth in HH	d) Edge of other towns or larger villages	e) Rural exceptions
BP26	North East Bedmond	✓	x	x	n/a	x	n/a
BP30	Site off Bedmond Road	✓	x	x	n/a	x	n/a
BP31	Site at Sheppeys Lane off Bedmond Road	✓	x	x	n/a	x	n/a
R72	Batchworth	✓	x	x	n/a	x	n/a

